

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 15, 2012

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the International Space University's (ISU) 25th Anniversary Celebration Dinner on October 23, 2012

On October 23, 2012, the International Space University (ISU), a non-profit organization under 501(c)(3) of the Internal Revenue Code is hosting its 25th Anniversary Celebration dinner, at the Cosmos Club, in Washington, D.C. The ISU provides an International, interdisciplinary and intercultural academic experience for the students enrolled in its degree and non-degree programs.

Approximately 150 people are expected to attend the event. The estimated cost of the dinner including all food and beverages is \$350.00 per person. The dinner will be attended by NASA personnel, representatives of the aerospace industry, academia, and other Federal agencies. I find that this dinner meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow attendees to exchange information regarding various NASA programs. Moreover, NASA employees whose duties do not substantially affect event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation from ISU for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

Employees receiving invitations from entities other than ISU such as table sponsors should also consult with their local ethics counselor for individual advice.

Kathleen T. Spear

for Adam F. Greenstone